



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

NOV 25 2013

Ref: 8EPR-N

Paul Bradford, Forest Supervisor
Kootenai National Forest
c/o Ellen Frament
31374 U.S. Highway 2
Libby, Montana 59923

RE: Kootenai National Forest Land Management
Plan/Final EIS, CEQ #20130281

Dear Mr. Bradford:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the August 2013 Final Environmental Impact Statement (EIS) for the Kootenai National Forest Land Management Plan (LMP). This Final EIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) Kootenai National Forest (KNF) to analyze the KNF's 2.2 million acres for potential environmental impacts associated with forest-wide management through the following proposed management area themes: Wilderness, Eligible Wild and Scenic Rivers, Special Areas, Research Natural Areas, Backcountry, General Forest, and Primary Recreation Areas.

The EPA provided comments on the Draft EIS in a May 2, 2012 letter. The Draft EIS analyzed four alternatives (i.e., No Action Alternative A and Action Alternatives B-D) and identified Alternative B as the Preferred Alternative. The action alternatives included potential management areas ranging from approximately 2%-10% Wilderness, 13%-22% Backcountry, and 59%-76% General Forest. The EPA's primary concerns with the Draft EIS were related to potential impacts to watersheds and water quality that might result from a lack of specificity in the LMP Objectives, Standards and Guidelines to attain identified Desired Conditions in a reasonable time frame.

The Final EIS identifies the selected alternative as a modified Alternative 3 with Forest management areas including 5% Wilderness, 22% Backcountry, and 63% General Forest. The Final EIS includes expanded discussion and/or revisions to Chapter 3, Affected Environment and Environmental Consequences, and supplemental information is provided in Appendix G, Response to Public Comments. With the expanded discussion and additional information, the Final EIS is generally responsive to EPA's Draft EIS comments.

We appreciate that the Final EIS clarifies statements regarding overall watershed and aquatic species effects of the management alternatives. We also appreciate the USFS's consideration of recommendations on the Draft EIS including suggestions for new and revised Objectives, Standards and

Guidelines. We note that the Final EIS includes protective revisions to Mineral Desired Conditions (FW-DC-MIN-01, to ensure consistency with desired conditions for other resources) and Aquatic Habitat Objectives (FW-OBJ-AQH-02, to assure structural and functional diversity of aquatic micro-invertebrate communities across the planning area). In addition, where the substance of recommended additions/revisions to the Objectives, Standards and Guidelines is addressed in other Forest Service directives, the Final EIS, Appendix G, provides references, summaries and identification of the relevant laws, regulations, policies and Records of Decision that will help to achieve Desired Conditions. A summary of retained decisions is also included in Appendix B of the LMP.

In several instances, the USFS's response to our comments indicates that some of the issues raised will be analyzed and incorporated at the project level. These issues include the potential impacts to Clean Water Act Section 303(d)-listed impaired water bodies, the goals and direction of any Total Maximum Daily Loads developed for such water bodies, and identification of, and measures to protect, source water protection areas and public water supplies. While these issues are appropriate considerations in developing LMP management areas and land use allocations, we appreciate the USFS's commitment to address these resource concerns in the future during site-specific analyses.

Thank you for the opportunity to review this Final EIS. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation